

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,) Case No. 8:09CR457
)
Plaintiff,)
)
vs.) **MOTION FOR ISSUANCE OF**
) **SUBPOENA IN FORMA PAUPERIS**
SHANNON WILLIAMS, et al,)
)
Defendant.)

Shannon Williams moves the Court pursuant to *Fed.R.Crim.P.* 17(c) and *NECrimR* 17.2 for permission to issue a subpoena *in forma pauperis* commanding Raynor, Rensch & Pfeiffer, a law firm with offices at 10110 Nicholas Street, Omaha, Nebraska, to produce at the earliest practicable time but no later than three (3) days following the service of the subpoena all billing records, time sheets, raw data for the same and/or receipts generated for or on behalf of Terry L. Haddock, a former employee of said law firm, in connection with his representation of or services he performed for the Defendant herein Shannon Williams, Richard Conway and Nyasha Muchegwa.

In support of this motion, Williams shows the Court:

1. In previous testimony before this Court, Haddock claimed he performed no legal work for Williams, despite his admission Williams paid Haddock substantial monies from and after December, 2008. Haddock claims the monies paid to him by Williams were applied as payment for Haddock's representation of others, including Conway, instead of Williams. Billing records, time sheets and/or receipts generated by Haddock in the names of Williams and Conway are therefore likely to be admissible as

evidence bearing on the issue of whether Williams had an attorney/client relationship with Haddock during the time frame relevant to Williams' defenses.

2. Conway, in previous testimony before the Court, himself claimed to have paid Haddock attorney fees for Haddock's representation of him, and also claimed to have paid Haddock for the legal fees of Nyasha Muchegwa. The records which are the subject of this request may therefore lend to the task of ascertaining the truth of who paid who for what, information which is essential to the effective presentation of Williams' defenses.

3. Williams tenders the affidavit of his undersigned counsel in support of this Motion in accordance with *NECrimR* 17.2 with the same incorporated herein by this reference.

4. Williams proceeds herein *in forma pauperis* pursuant to the previous order of the Court. Accordingly, he requests the subpoena be issued by the Clerk, served at the direction of the undersigned and that he be relieved of any obligation to pay for the costs of said subpoena and witness fees and mileage expenses prior to trial.

5. Williams offers herewith a completed subpoena for issuance by the Clerk in the event it is determined this Motion should be granted.

WHEREFORE, Shannon Williams prays for an Order authorizing the issuance of the *Fed.R.Crim.P.* 17(c) subpoena described above.

SHANNON WILLIAMS, Defendant,

By /s/ Michael J. Tasset
His Attorney
JOHNSON AND MOCK
307 North Oakland Avenue
P.O. Box 62
Oakland, Nebraska 68045
(402) 685-5647

CERTIFICATE OF SERVICE

I, Michael J. Tasset, hereby certify that on November 22, 2010, I electronically filed the foregoing instrument with the Clerk of the Court using the CM/ECF system which sent notification of such filing to Maria R. Moran, Assistant United States Attorney.

/s/ Michael J. Tasset
Michael J. Tasset